

United States Environmental Protection Agency Region 10 Emergency Response Unit POLLUTION REPORT

I. HEADING

Date: March 13, 2000

Subject: CleanCare Removal Site (CleanCare), Tacoma, Washington

From: Michael Szerlog, OSC, USEPA, Region 10, Emergency Response Unit

Tel: Office (206) 553-0279

TO: See Distribution List on last page

POLREP No.13 (Progress)

II. BACKGROUND

Site ID: SSID # 106W Delivery Order No: 081-10 -02

Response Authority: CERCLA,

CERCLIS No: WASFN1002182

NPL Status: Not Listed (former RCRA site within Commencement

Bay Superfund site)

State Notification: Washington State Department of Ecology referred site

to EPA

Action Memo Status: Signed on December 17, 1999 and January 7, 2000

Removal Start Date: December 17, 1999 Expected Completion Date: March 17, 2001

Site Web Page: www.epa.gov/r10earth, click Index, click C for

CleanCare. or use URL: http://epainotes1.rtpnc.epa.

gov:7777/r10/cleanup.nsf/sites/CleanCare

III. SITE INFORMATION

A. Incident Category

This is a time-critical removal action at an inactive waste management facility

B. Site Description

1. Site Location

The CleanCare site is located at 1510 Taylor Way in Pierce County, City of Tacoma, Washington at Township 21, Range 3 E. in Section 26. The site comprises approximately 4.2 acres latitude 47/ 16' 25" North and longitude 122/ 23' 32" West. The site is located in the ATacoma Tideflats@ area about three miles northeast of downtown Tacoma. The site is owned by David Bromley of Bromley-Marr ECOS Inc.

The CleanCare site was an interim status treatment, storage, disposal, and recycling (TSD) facility for off-site generated hazardous and non-hazardous wastes - one of a handful of commercial TSDs operating in the state of Washington. When the facility was in operation its major function was to solidify oily sludge wastes originating from catch basins, sumps, and storm drains; recycle waste oils, antifreeze, and spent solvents; and crush used oil filters for off-site recycling by other facilities.

The CleanCare facility has four separate tank farms (Tank Farm (TF)-1, TF-2, TF-3, and TF-4), two hazardous/dangerous waste container storage pads (container storage (CS) CS-4A and CS 4-B), and a processing area where the distillation of solvent, oil, and antifreeze used to occur.

IV. Response Information

A. Situation

1. Current Situation

March 6, 2000 (Monday)

Personnel on site: 6 START, 12 ERRS, 3 USCG, 1 EPA Weather: low 40s to low 50s, intermittent rain, low wind All site personnel attended daily safety meeting and discussed site safety and planned activities. START conducted analytical data management, Applied for discharge of Baker Tank (BT) # 16, Organized photographs for presentation, Mapped surface water bodies and storm drains on site including their distance to Tank Farm 1, City of Tacoma Public Works on site to take quality assurance (QA) sample of water from BT #16. ERRS continued treatment of contact water, Moved drums out of Building 5 and segregated into proper waste streams, Discharged 20,000 gallons of treated storm water from BT # 16 into the Tacoma City sewer, Pumped 41 oil related drums from Building 5 into a poly tank,

Loaded crushed RCRA drums into dumpster, Continued Hazcatting of drums in Building 5.

March 7, 2000 (Tuesday)

Personnel on site: 5 START, 12 ERRS, 3 USCG Weather: partly cloudy, light wind, low 50's F

All site personnel attended daily safety meeting and discussed site safety and planned activities. START continued inventory of antifreeze drums, Sectioned off inventoried antifreeze drums, Collected sample of treated surface water from Baker Tank 22 for potential discharge to the City of Tacoma Sanitary Sewer, Entered analytical data into spreadsheets, Assisted OSC by providing photographs for presentation. ERRS continued pumping and treatment of contact water, Emerald Services on site to pick up one load out of BT 24, Performed compatibility tests on antifreeze drums, Staged the unknown drums for sampling.

March 8, 2000 (Wednesday)

Personnel on site: 5 START, 11 ERRS, 3 USCG, 3 EPA Weather: cloudy, intermittent light rain, light wind, high of 45 F. All site personnel attended daily safety meeting and discussed site safety and planned activities. OSC overview and site tour for EPA Director and Assistant Director of the Office of Environmental Cleanup. START oversaw and documented generator drum removal activities (27 drums shipped today), Inventoried drum levels and contents and assisted ERRS in collecting Hazcat samples for unknown drums located south and east of Tank Farm #3 and in Building 5, Entered analytical information into tracking spreadsheets. Conducted analytical data management, Updated Talking Points for OSC meeting. ERRS continued treatment of contact water. Loaded drums into truck for generators to pickup, Conducted Hazcatting and sampling of unknown drums. Placed formerly unknown drums into proper waste groups, Removed used spill pads from drums and removed liquids before placing them into dumpsters for disposal.

March 9, 2000 (Thursday)

Personnel on site: 6 START, 12 ERRS, 2 USCG, 0 EPA
Weather: Light rain AM, Partly Cloudy PM, high lower 50's
All site personnel attended daily safety meeting and discussed site
safety and planned activities. START oversaw and documented
generator drum removal activities (13 drums shipped today),
Inventoried drum levels and contents and assisted ERRS in
collecting Hazcat samples for unknown drums located in Building 5,
Entered analytical information into tracking spreadsheets,
Conducted analytical data management, Began setup of remote
meteorological station, Applied to City of Tacoma Sanitary Sewer
for discharge of treated storm water (Batch # 7) from BT 22,

Oversaw ERRS discharge of treated storm water, Provided Action Memorandum and all Polreps to the Puyallup Tribe legal office. ERRS continued treatment of contact water, Discharged 20,000 gallons of treated storm water from BT 22 to the City of Tacoma Sanitary Sewer, Loaded drums into truck for generators to pickup, Conducted Hazcatting and sampling of unknown drums, Placed formerly unknown drums into proper waste groups, Emerald Services on site to pick up the rest of the storm water from BT 24 and one load of storm water from BT 23, Prepared to decontaminate BT 24.

March 10, 2000 (Friday)

Personnel on site: 6 START, 10 ERRS, 2 USCG, 1 EPA Weather: Clear in AM, light breeze, high in the low 50's

All site personnel attended daily safety meeting and discussed site safety and planned activities. START oversaw and documented generator drum removal activities (28 drums shipped today), Organized site photographs and provided selected negatives to the Coast Guard, Entered analytical information into tracking spreadsheets, Conducted analytical data management, Continued setup of remote meteorological station, Labeled the sampled unknown drums, Discussed Tank Farm sampling with Washington DOE. ERRS continued treatment of contact water, Decontaminated BT 24, Loaded drums into truck for generators to pickup, Conducted Hazcatting of unknown drums, Placed formerly unknown drums into proper waste groups.

March 11, 2000 (Saturday)

Personnel on site: 0 START, 0 ERRS, 0 USCG

Weather: Overcast, light rain until 11 AM, light breeze, high in the

low 50's

No work on site today.

2.Removal Actions to Date

On January 7, 2000, the Action Memorandum to increase site ceiling, to ask for a \$2 million exemption, a 12-month exemption, and a change of scope was signed. A purchase request was also signed and ERRS was funded, incrementally, to begin removal activities.

The State (Washington Department of Ecology) and the City (City of Tacoma Public Works) continue to provide assistance with discharge of treated contact water.

Drums -

- Oil Filter Drums: This phase of the project is completed.
- RCRA Drums: Finished segregation and inventory of all non oil filter drums known to be located on the site (formerly referred to as RCRA drums). Selected generators have removed a total of 490 drums and 12 totes of waste.
- Oil Drums in Building #5: Continued sampling and collecting data for the oil drums located in the southern portion of Building #5 and started performing Hazard Categorization tests on these samples. The material from 105 of these drums and 4 totes was pumped into a 6,000 gallon storage tank to reduce disposal costs. Disposal facility to be determined.
- Antifreeze Drums: Antifreeze from 65 drums has been pumped into Baker Tank #18. All identified drums of antifreeze (108) have been inventoried and staged north of BT # 18 for bulking prior to disposal. Disposal facility to be determined.
- Solvent Drums: All identified drums of spent solvent have been inventoried. Spent Solvent from 520 drums has been pumped into BT # 9 for bulking prior to disposal. Disposal facility to be determined.

Baker Tanks - To date 279,048 gallons of water has been hauled off-site by Emerald Services for disposal. Treated and discharged five batches (approximately 100,000 gallons total) of waste water to the City of Tacoma Sanitary Sewer System. Baker Tanks are decontaminated and returned to the vendor after they are emptied.

Surface Water - This week, continued treating contact surface water and decontamination water with the temporary waste water treatment system. Terminated discharge of non contact surface water to the Lincoln Ave. ditch. Discharge was previously performed under agreement with Washington State Department of Ecology.

ASTs - To date all of the ASTs in Tank Farm 1 (T-1, T-3, T-4, and T-5) and Tank Farm 2 (T-7, T-8, T-9, T-10, T-11, T-12, T-13, T-14, and T-15) have been sampled. The contents of Tank Farm 3 (T-18, T-19, T-20, T-21, T-22, T-23, T-24 and T-25) has been determined using an oil/water interface probe.

Soil - No work was performed this week regarding site soils. To date, 14 soil samples were collected during the assessment phase to characterize site soils.

3.Enforcement

The Region currently has some information regarding potential responsible parties (PRPs) at the site. EPA intends to gather additional PRP information during the removal action.

B.Planned Removal Activities

To minimize/eliminate to threat to human health and the environment posed by the wastes on the site, the following removal activities are planned:

- <u>Drums:</u> organization of drums and documents (manifests & profile analyses), generator notification, hazard categorization and disposal tests, and removal of containers from the site.
- <u>Baker Tanks:</u> The water from some tanks will continue to be treated on site and discharged. At the same time, water from other Baker Tanks will continue to be shipped off site. As tanks are emptied, they will be returned to the rental company.
- <u>Surface Water:</u> manage surface water as it collects onsite (including sampling, treatment, and discharge), clean concrete and asphalt surfaces that currently impact surface water, establish and implement a long term. plan/recommendation for surface water management including possibly construction of an asphalt cap.
- ASTs: sampling, handling of contents (off site disposal or combination of onsite treatment and off site disposal anticipated), clean tanks, possible dismantling of some tanks and containment structures and remove from site
 - <u>Soil:</u> Possible further sampling prior to excavation, confirmation sampling, and removal from site or onsite treatment. Installation of asphalt cap if deemed necessary.

C.Next Steps

EPA, ERRS, START, and the USCG Strike Team to continue managing onsite surface water. Complete the data management for all RCRA drums, locate and file the manifests for the RCRA drums, and prepare for generator recovery of waste drums. Treat some Baker Tank water, ship some of it off site. Discharge treated contact and non contact water to the Tacoma Sanitary Sewer, in accordance with the Special Approved Discharge (SAD). Decontaminate Baker Tanks as they are emptied and return them to the vendor.

D.Key Issues

Security Off Duty City of Tacoma Police continue with site security.

<u>Discharge of non contact waters</u> Non contact surface water is no longer being discharged to the Lincoln Avenue Ditch. All non contact surface water is being treated along with the contact surface water. Previously, after receiving daily permission from the Washington State Department of Ecology (DOE), non contact surface water was discharged following DOE established discharge requirements.

Management of contact water; Contact surface water (that which falls with in the

secondary containment structures) is being pumped into temporary storage tanks (Baker Tanks). This water will has been analyzed and some of it is being treated and discharged and some is being disposed off site. Performing both tasks simultaneously will reduce the length of time required to accomplish this task, reduce the associated costs, such as Baker Tank rental fees, and remove the threat of a release.

<u>Drum/Container Waste</u>; Generators of site waste stored in drums/containers will have the opportunity dispose of their wastes.

V. Cost Information

Estimated costs are summarized below

	Established	Estimated Costs
	Ceiling	(as of 3/11/00)
EPA	\$ 150,000	\$27,500
START	\$ 350,000	\$120,216
ERRS	\$ 1,100,000	\$ 739,781
Coast Guard	\$ 100,000	<u>\$46,761</u>
Total	\$ 1,700,000	\$ 934,258

Note: The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

VI Disposition of Wastes

Waste Stream	Medium	Quantity	Containment- Migration Control	Treatment	Disposal
Used Oil Filters	solid and solidified waste	270 cu yd	placed liners in rolloffs	removed oil filters from 55 gallon drums and consolidated in rolloffs	Waste Management delivered to Olympic View Sanitary Landfill
Used Oil Filter Drums	solid waste	120 cu yd	placed liners in rolloffs	crushed drums with an excavator to reduce volume	Phillips Services Corp. Delivered to Bethlehem Steel for recycling.
Used RCRA Drums	solid waste	164 cu yd	placed liners in rolloffs	crushed drums with an excavator to reduce volume	Phillips Services Corp. Delivered to Columbia Ridge Landfill.
Generator Drums	sludges and liquids	490 drums and 12 totes	NA	generators contracted with TSDs to properly manage their waste	Brought to various disposal companies
Oily Debris	solidified waste	20 cu yd	placed liners in rolloffs	consolidated in rolloffs	Phillips Services Corp. delivered to Olympic View Sanitary Landfill
Contact Rain Water	liquid	279,048 gal	contained in Baker Tanks	Emerald Petroleum Services=s (EPS) water treatment plant	EPS, to City of Tacoma Sanitary Sewer
Contact Rain Water	liquid	123,400 gal	contained in Baker Tanks	Phillips Services Corp. water treatment plant	Phillips Services Corp. to City of Tacoma Sanitary Sewer
Contact Rain Water	liquid	100,000 gal	contained in Baker Tanks	treated on site with temporary waste water treatment system	to City of Tacoma Sanitary Sewer
Baker Tanks	solid	Tank 15	NA	pressure washed, and wiped down	returned to Vendor (Baker Tanks, Inc.)
Tip Trailers	solid	11 trailers	NA	transported off site to make room for other activities	temporarily stored at the Phillips Services Corp. facility adjacent to the site
Oil From Drums	liquid	105 drums + 4 totes		a 6,000 gallon poly tank on site	to be determined
Antifreeze from Drums	liquid	65 drums		bulked into Baker Tank #18	to be determined

VII Distribution

To: EPA Headquarters, Washington, D.C. Attention: Terry Eby EPA Region 10, Emergency Response Unit, Attention: Chris Field EPA Washington Operations Office, Attention: Julie Hagensen Washington State Department of Ecology, Attention: Jim Sachet City of Tacoma Public Works Department, Attention: Michael Kennedy EPA Region 10 Web page, Attention: Beth Kunz

EPA Region 10, Emergency Response Unit, Attention: OSCs

VII Status

Case Pending.